

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RITA NAMROD,

Plaintiff,

v.

ACIA KL AUTO LLC CO d/b/a Leader
Automotive Group, and/or d/b/a Grossinger
Kia and/or Kia of Lincolnwood's,

Defendant.

Case No. 21-cv-05514

Honorable Thomas M. Durkin

DEFENDANT'S AGREED MOTION FOR SETTLEMENT CONFERENCE

Defendant ACIA KL AUTO LLC, d/b/a Kia of Lincolnwood and/or Grossinger Kia incorrectly named as ACIA KL AUTO LLC CO d/b/a Leader Automotive Group and/or d/b/a Grossinger Kia and/or Kia of Lincolnwood ("Defendant"), by and through its counsel, respectfully submit its Agreed Motion for Settlement Conference and in support thereof, states as follows:

1. On March 26, 2024, the Court entered an Order confirming the May 6, 2024 trial date and setting new trial deadlines (Dkt. 42).
2. On April 10, 2024, this Court entered an order setting the final pretrial conference for May 2, 2024 (Dkt. 44).
3. After engaging in informal settlement negotiations, both Parties believe a settlement conference may be successful in resolving this case and, therefore, in an effort to possibly avoid the significant time and expense involved in taking the matter to trial, the parties request a settlement conference with the magistrate judge be set in this matter for either April 15-16, 2024 or April 22, 2024 – April 25, 2024.

4. In the event the parties fail to reach a final agreement or an agreement-in-principle at the settlement conference, the parties will proceed to trial as scheduled.

5. This motion is brought in good faith and without prejudice to any party.

6. For the reasons set forth above, the parties respectfully request that this matter be referred to the magistrate judge for a settlement conference, to be scheduled by the Court during the time period of April 15-16, 2024 or April 22, 2024 – April 25, 2024.

WHEREFORE Defendant ACIA KL AUTO LLC, d/b/a Kia of Lincolnwood and/or Grossinger Kia incorrectly named as ACIA KL AUTO LLC CO d/b/a Leader Automotive Group and/or d/b/a Grossinger Kia and/or Kia of Lincolnwood, respectfully requests that the Court enter an Order referring this case to the magistrate judge for a settlement conference on a date certain during the time period of April 15-16, 2024 or April 22, 2024 – April 25, 2024, to be selected by the Court, and for any further relief it deems just and appropriate.

Dated: April 12, 2024

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Respectfully submitted,

O'HAGAN MEYER LLC

By: /s/ Sheri A. Mercier
Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned attorney certifies that on April 12, 2024, she caused the foregoing **Defendant's Agreed Motion for Settlement Conference** to be filed electronically with the Clerk of Court using the CM/ECF system, which will send notification of, and thereby serve such document on, the following attorneys of record:

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